

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

OLIVIA Y., et al.

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, et al.

DEFENDANTS

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of Sue Perry, former Director, Mississippi Division of Family and Children's Services, on Monday, August 1, 2005, beginning at 8:30 a.m. at the law offices of Bradley Arant Rose & White, LLP, 188 East Capital Street, Suite 450, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

RESPECTFULLY SUBMITTED, this, the 25th day of May, 2005.

/s Melody McAnally  
W. Wayne Drinkwater, Jr. (MBN 6193)  
Melody McAnally (MBN 101236)  
BRADLEY ARANT ROSE & WHITE LLP  
188 East Capital Street, Suite 450  
Jackson, Mississippi 39201  
(601) 948-8000

Stephen H. Leech (MBN 1173)  
850 East River Place, Suite 300  
Jackson, Mississippi 39202  
(601) 355-4013

Marcia Robinson Lowry (MBN 43991 *pro hac vice*)  
Eric E. Thompson (MBN 43993 *pro hac vice*)  
Shirim Nothenberg (MBN 43990 *pro hac vice*)

Corene Kendrick (MBN 43989 *pro hac vice*)  
CHILDREN'S RIGHTS  
404 Park Avenue South  
New York, New York 10016  
(212) 683-2210

John Lang (MBN 43987 *pro hac vice*)  
Christian Carbone (MBN 43986 *pro hac vice*)  
Eric Manne (MBN 43988 *pro hac vice*)  
LOEB & LOEB LLP  
345 Park Ave.  
New York, New York 10154  
(212) 407-4000

*PLAINTIFFS' COUNSEL*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2005, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Betty A. Mallett, Esq.  
McGlinchey Stafford, PLLC  
200 South Lamar Street, Suite 1100  
Jackson, MS 39201

Harold E. Pizzetta, III, Esq.  
Assistant Attorney General  
General Civil Division  
Carroll Gartin Justice Building  
430 High Street  
Jackson, MS 39201

*Attorneys for Defendants*

/s Melody McAnally